

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA)	
)	
v.)	
)	
JOSEPH CARAMADRE)	Criminal No. 11-186-S
)	
and)	
)	
RAYMOUR RADHAKRISHNAN)	
Defendants)	

**DEFENDANT JOSEPH CARAMADRE'S MOTION IN LIMINE TO PRECLUDE
EVIDENCE OF SO-CALLED "LOSS/GAIN" CALCULATIONS**

Defendant Joseph Caramadre hereby moves that the Court preclude the use of evidence by the government of certain amounts of money the government alleges to be "losses" incurred by purported victims, and/or gains to himself or others, as well as the characterization of such amounts as "losses" and/or "gains".

In support hereof, Mr. Caramadre relies upon the Memorandum of Law submitted herewith.

WHEREFORE, Mr. Caramadre hereby moves that

- (a) evidence of particular amounts of alleged "losses" and/or "gains" be excluded from admission, and
- (b) any summary charts or exhibits used by the government at trial, whether or not admitted into evidence, be labeled in such a way as to eliminate prejudicial and inflammatory references to "losses" or "gains" or other characterizations of the defendant's conduct, which are determinations that must be made by the jury.

Respectfully submitted,
JOSEPH CARAMADRE
By his Attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2012, a copy of the foregoing pleading was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Anthony M. Traini
Anthony M. Traini